

## **REMARKS**

Applicant is in receipt of the Office Action mailed May 28, 2004. New claim 47 has been added. Claims 1, 16, 20, 30, 33, and 34, have been amended to more clearly claim the present invention. Thus, claims 1, 4-9, 12-20, 22-34, 37-42, and 45-47 remain pending in the case. Further consideration of the present case is earnestly requested in light of the following remarks.

### **§103 Rejections**

Claims 20, and 22-29 were rejected under §103 as being unpatentable over Brandle et al. in view of Admitted Prior Art (APA).

Claims 16-18, and 30-32 were rejected under §103 as being unpatentable over Brandle et al. in view of Admitted Prior Art (APA) and further in view of Wadhwa, and further in view of Hullot.

Claims 1, 4-9, 12-15, 19, 33-34, 37-42, and 45-46 were rejected under §103 as being unpatentable over Hullot, in view of Admitted Prior Art (APA) and Wadhwa, and further in view of Brandle.

Applicant has amended independent claim 1 to recite the limitations:

wherein said specifying comprises mapping the at least one input and the at least one output to respective entry point function parameters;

wherein the functional interface is specific to the graphical program;

wherein said calling the entry point function comprises providing values for the respective input parameters in accordance with said mapping;  
and

the entry point function directly invoking the graphical program in response to said calling the entry point function;

Similarly, Applicant has amended independent claims 16 and 30 to include the limitations:

wherein said specifying comprises mapping the at least one input and the at least one output to respective entry point function parameters;

wherein the functional interface is specific to the graphical program;  
wherein the function takes values for the respective input parameters in accordance with said mapping as inputs;  
and  
wherein the graphical program is directly invocable via the functional interface.

Independent claim 20 has been amended to include the limitation:

wherein, in response to a program calling the entry point function, the entry point function is operable to directly invoke the graphical program;  
and  
wherein said calling the entry point function comprises providing values for the respective input parameters in accordance with said mapping.

Independent claim 34 has been amended to include the limitations:

wherein said specifying comprises mapping the at least one input and the at least one output to respective entry point function parameters;  
wherein the functional interface is specific to the graphical program;  
wherein said calling the entry point function comprises providing values for the respective input parameters in accordance with said mapping  
and  
directly invoke the graphical program in response to said calling the entry point function, wherein the entry point function directly invokes the graphical program;

The Office Action traversed Applicant's previous arguments, based primarily on the fact that none of the independent claims (as then written) specified whether the graphical program was invoked directly or indirectly. Applicant has thus proposed the above amendments to clarify this issue.

As noted in the previous Response, neither Brandle nor APA provides a motivation to combine, and so the combination is improper. Additionally, Applicant notes that even were the references properly combinable, the resulting combination would not produce Applicant's invention as claimed.

As argued in the previous Response, nowhere does Brandle teach or suggest a graphical program as defined in the present Specification and Claims. Nor does Brandle nor the APA teach a shared library that includes an entry point function associated with a graphical program, where in response to a program calling the entry point function, the entry point function is operable to directly invoke the graphical program, and where calling the entry point function comprises providing values for the respective input parameters in accordance with said mapping.

Thus, Applicant respectively submits that neither Brandle nor the APA, either singly or in combination, teaches or suggests all of the limitations of claim 20.

Regarding amended claims 1, 16, 30, and 34, as argued above and in the previous Response, nowhere does Brandle teach or suggest a graphical program. Neither does Brandle disclose specifying a functional interface for a graphical program, *wherein said specifying comprises mapping the at least one input and the at least one output to respective entry point function parameters, and wherein the functional interface is specific to the graphical program*. Rather, as noted earlier, Brandle teaches a single standard format software interface for calling system library routines from applications (Abstract). In other words, Brandle discloses a single generic software interface whereby applications may call system library routines, and specifically does not teach or suggest specifying a functional interface that is *specific* to the graphical program, and where the specified functional interface maps the input(s) and output(s) of the graphical program to *respective* parameters of the entry point function. Brandle further fails to disclose such an entry point function being callable to *directly invoke* the graphical program, e.g., according to the specified parameter mapping of the functional interface, where calling the entry point function comprises providing values for the respective input parameters in accordance with said mapping.

Applicant submits that the APA (Admitted Prior Art) similarly fails to teach or suggest several features of the independent claims. For example, nowhere does the APA teach or suggest *specifying a functional interface specific to the graphical program*. Rather, as described in the Background section, the APA involves a call to an ActiveX interface, which is a generic interface and is not specific to the graphical program. In

addition, the APA also does not teach or suggest that the graphical program is *directly* invocable via the functional interface. Rather, as described in the Background section, the APA described uses an *indirect* invocation mechanism, specifically, a Dynamic Linked Library (DLL) that has entry points that call a graphical program *indirectly* by interfacing with an ActiveX out-of-process server, which may be inefficient due to use of a process switch. Thus, the APA actually *teaches away* from Applicant's invention as claimed.

The Office Action cites Wadhwa and Hullot in addition to Brandle and APA in the 103 rejection of these claims. As submitted in the prior Response, neither Brandle, APA, Wadhwa, nor Hullot provides a motivation to combine. Rather, the Examiner appears to have simply selected certain portions of these references using Applicant's claims as a blueprint in an attempt to construct the claimed invention, citing an improved result as motivation. As the Examiner is certainly aware, such an argument is simply hindsight analysis and is impermissible. Additionally, as argued above, the APA clearly teaches away from Applicant's invention as claimed, and so the combination of Brandle, APA, Wadhwa, and Hullot is improper. Moreover, Applicant submits that even were Brandle, APA, Wadhwa, and Hullot properly combinable, which Applicant argues they are not, the resulting combination would not produce Applicant's invention as claimed.

As argued above, neither Brandle nor APA teaches the limitations of claims 1, 16 30, and 34. Moreover, Applicant submits that Wadhwa and Hullot fail to overcome the deficiencies of Brandle and APA. For example, as argued in the previous Response, the Wadhwa reference discusses generally building a new program into an executable program or dynamic linked library (DLL), but as the previous Office Action admitted, "Wadhwa does not explicitly teach a graphical program, specifying a functional interface for the graphical program, and the shared library includes a function created according to the functional interface." The Office Action attempted to combine Wadhwa with the APA to provide these features, but, as argued above, combining with the APA is improper, and does not produce Applicant's invention as represented in claims 1, 16, 30, and 34.

Neither does Wadhwa teach the additional limitations included in these claims in the above amendments, e.g., the mapping of the inputs/outputs to *respective* parameters of the functional interface, the graphical program specificity of the functional interface, and the *direct* invocation of the graphical program by the entry point function, including providing values for the respective input parameters in accordance with said mapping.

As also argued previously, the graphical user interface of Hullot that the Office Action cites is not a functional interface for a graphical program that is directly invocable in a shared library by an entry point function, but rather Hullot discloses a graphic interface configuration system that allows a user to create a graphic interface for a computer program. Applicant notes that Hullot's described graphical user interface is *not* a functional interface for direct invocation by an entry point function of a graphical program in a shared library, and thus Hullot actually teaches *away* from Applicants invention as represented in claims 1, 16, 30, and 34. Rather, Hullot describes a GUI of a program development environment that allows a user to create a GUI for a program. Nowhere does Hullot mention a graphical program as defined in the present Application and claims, nor specifying a *functional interface* for a graphical program for invoking the program from a shared library (as opposed to a GUI for the program), nor does Hullot mention or even hint at a library, e.g., a shared library, nor an entry point.

Applicant respectfully submits that neither Brandle nor the APA, nor Wadhwa, nor Hullot, taken either singly or in combination, teaches or suggests all of the limitations of claims 1, 16, 30, and 34.

Thus, for at least the reasons provided above, Applicant submits that claims 1, 16, 20, 30 and 34, as currently written, are distinguished and non-obvious over the cited references, and are thus allowable, as are claims respectively dependent thereon. Removal of the 103 rejection of these claims and their respective dependent claims is respectfully requested.

Applicant has added new claim 47 to more completely claim the present invention. Applicant notes that no new matter was added, and that many of the above

arguments also apply to this claim. Applicant thus submits that claim 47 is similarly distinguished and non-obvious over the cited art.

Therefore, Applicant submits that the present claims (as amended) are in condition for allowance.

Applicant has also presented numerous arguments in the prior response, hereby incorporated by reference, that present further reasons for the allowability of the claims. Applicant believes that the above amendments place the application into condition for allowance.

## CONCLUSION

In light of the foregoing amendments and remarks, Applicant submits the application is now in condition for allowance, and an early notice to that effect is requested.

If any extensions of time (under 37 C.F.R. § 1.136) are necessary to prevent the above referenced application(s) from becoming abandoned, Applicant(s) hereby petition for such extensions. If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert & Goetzel PC Deposit Account No. 50-1505/5150-39900/JCH.

Also enclosed herewith are the following items:

- Return Receipt Postcard
- Request for Continued Examination
- Check in the amount of \$ \_\_\_\_\_ for fees ( \_\_\_\_\_ ).
- Other: \_\_\_\_\_

Respectfully submitted,

  
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